

**LAW OFFICES OF**  
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February 20, 2017

**VIA EMAIL ONLY**

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Re: *Jane Doe #1, et al v Mayfield City School Dist. Bd of Ed, et al.*

Dear Counsel;

Based upon the request of Sarah Kutscher that the "Mayfield" witnesses be rescheduled from March 2, 2017 to the inclusive dates of March 20 – March 23, enclosed is a new Notice to take the deposition of a 30(b)(6) witness for Defendant Mayfield City School District Board of Education. In that regard please note the bold-face updated changes to the Amended Exhibit "A" and the Amended Duces Tecum.

I am requesting the following additional employees of the School Board to be made available for deposition commencing at 1:00 p.m. on March 20, 2017, previously listed on my letter to counsel dated February 16, 2017; to wit:

Nancy Barron – Phys Ed Teacher, Girls Track Coach  
Anthony Capora  
Frank Stubsky  
Michael Barnes  
Keith Leffler

I am requesting that the following employees of the School Board be made available for deposition on Tuesday, March 21, 2017, whose depositions were requested in my letter to counsel dated December 28, 2016; to wit:

Ross Bandera  
Mrs. Valentino  
James A. Loewer  
Chuck Wilakas  
Susan Beatty  
Jim Dasher  
Janet Barr



I am happy to take these depositions either at the Office of Smith Peters Kalail or the Mayfield City School District Board of Education offices.

Very truly yours,

*/s/ Murray D. Bilfield*

Murray D. Bilfield  
BILFIELD & ASSOCIATES  
MDB/srs

Enclosure